

**WASTE & UNDERGROUND STORAGE TANK
MANAGEMENT BUREAU
HAZARDOUS WASTE SECTION**

***ASBESTOS CONTROL PROGRAM
BUSINESS PLAN***

CALENDAR YEAR 2015

Department and Program Mission Statements

The Department of Environmental Quality's mission is to protect, sustain, and improve a clean and healthful environment to benefit present and future generations.

The Asbestos Control Program's (program) mission is to protect human health and the environment from exposure to asbestos. The program strives to accomplish this by providing education, training, and compliance assistance while regulating the Montana asbestos industry. The program upholds the state and federal regulations for which it has authority.

Program Vision Statement

The program's vision is that all the public, commercial and industrial buildings in Montana, including all state and federal government buildings, restaurants, stores, churches, factories, schools, and apartments – properly renovate or demolish and dispose of waste so that there are no exposures of asbestos by building occupants or unknowing persons. The program's vision is of a program that works together with contractors, consultants, industry trade groups, worker protection agencies, building code offices, landfill operators, sanitarians, and citizens so that all have an appropriate understanding of asbestos control regulations as it relates to their respective roles in environmental protection.

The program's vision is of a robust and credible enforcement from the program that deters significant noncompliance with asbestos control requirements through consistent, timely, and appropriate actions and penalties so that no worker or citizen need fear exposure of asbestos from a renovation or demolition project. The program will work directly with private, state, county, and federal partners to assure swift and accurate assessment to assist with return of compliance.

Succession Planning

The program will document current technical support and administrative staff knowledge of business processes, rules, and procedures as related to each position that will assist new technical support or administrative staff in performing in the position at a level close to or commensurate with the level of the individual departing the program. When new policies are developed, all staff members will be educated and enlightened during staff meetings or other forums to ensure that all program members are aware of updated policies and positions.

UPDATE DESK MANUAL	ASSIGNED TO:
ACP Data Control Procedures	Kerri Blanton
ACP Asbestos Desk Manual	Greg Kurvink & John Benoit

Goals and Action Plan

The Asbestos Control Program will continue to uphold Montana asbestos statutes and rules to deliver a clear, concise, and consistent perspective of the asbestos statutes and rules. The program will accomplish this objective, build relationships, and increase confidence within the regulated the community and stakeholders, through attainment of the following goals and actions:

Goal: Increase asbestos awareness and outreach with the Building Code and Permit Departments in Montana

The program will:

- Outreach to the Building Permit departments in Montana by visiting the departments and disseminating asbestos information.
- Give presentations at asbestos association meetings, union meetings, and other building related association meetings (contractors, homebuilders, roofing, etc.).
- Work with county commissioners and other city officials to implement city ordinance reviews.
- Meet with the DEQ Small Business Ombudsman to re-establish lines of communication to increase community asbestos awareness.

Goal: Provide compliance assistance.

The program will:

- Initiate early intervention with previously unidentified sources of potential asbestos renovation and demolition projects.
- Review permit bids and publically-notified projects, and contact the responsible parties and provide them with resource information and compliance assistance regarding their responsibilities according to the asbestos regulations.

Goal: Inform, educate, and empower the accredited asbestos professionals and regulated community to make their own decisions by referring to the asbestos statutes and rules.

The program will:

- Highlight frequently asked questions, Environmental Protection Agency determinations, and program clarifications on the program's website via our List Serve.
- Develop a program business plan to assure the above information is disseminated monthly.
- Provide Train-the-Trainer sessions for all training providers.
- Develop an enhanced process for air clearance and inspection report requests.

Goal: Increase the efficiency of the Asbestos Control Program resulting in an increased field presence.

The program will:

- Utilize Microsoft Outlook Tasks to track and assure timeliness of inspection reports, letter drafts, letter reviews, etc.
- Complete the online permitting service and identify enhancements for future projects
- Construct templates for repetitive program letters.
- Document procedures and policies in a business plan format:
 - Correspondence proofing.
 - Final document scanning and filing on G:\drive.
 - Removal of draft correspondence.

Goal: Grow program employees by providing them continuing education and training opportunities.

The program will:

- Identify and evaluate asbestos sampling courses.
- Evaluate Environmental Protection Agency sampling training courses.

- Attend regional and national conferences on asbestos.
- Attend technical writing classes and computer software classes.

Goal: Review and revise asbestos rules.

The program will:

- Draft a new fee structure for discussion with program stakeholders.
- Draft revised rules to add clarity to those published October 2011.
- Establish a working rapport and discussion sessions with all stakeholders regarding proposed rule changes.

Goal: Accreditation Paperwork Reduction.

The program will:

- Review and develop a process to reduce or eliminate paperwork associated with asbestos accreditation and project permit applications.

Successes and Lessons Learned

Successes:

Technical individuals have conducted over 270 permitted site visits since the beginning of 2014, have reviewed and issued 325 permits and demolition acknowledgements, reviewed and issued 11 annual facility permits, logged over 150 compliance assistance efforts, have referred in writing 60 complaints to enforcement, have reviewed 41 complaints generated directly from enforcement, have issued (or are in review) 22 violation letters, have reviewed 42 inspection reports, conducted 22 full paperwork reviews, spoke at the Statewide Fire Conference, presented at the Hazwoper course sponsored by Solid Waste, participated in the MSU “Water School” regarding pipe busting, crafted and distributed a letter to each county and municipal office in the state regarding asbestos regulations, devoted hundreds of hours on two large permitted sites that were non-compliant, logged nearly 1200 phone calls, and have provided technical and fee revision suggestions for the 2014 rule rewrite

Lessons Learned:

Document frequently and before a situation develops.

Keep all staff in the program updated with phone calls received and answers given.